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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

OLIVE TOLI,

Defendant.

Case No: 2:12-cr-00440-APG-GWF-9

Case No: 2:12-cr-00451-APG-CWH

**STIPULATION TO MODIFY
DEFENDANT OLIVE TOLI'S
CONDITIONS OF RELEASE ON
APPEARANCE BOND
TEMPORARILY TO TRAVEL
OUTSIDE OF CLARK COUNTY,
NEVADA FROM AUGUST 28, 2017-
SEPTEMBER 3, 2017**

(Expedited Review Requested)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney, and Robert Knief, Assistant United States Attorneys, counsel for the United States of America, and Melanie A. Hill, counsel for defendant Olive Toli that the travel restriction condition of Olive Toli's release on appearance bond limiting his travel to Clark County [Dkt #69 in 2:12-cr-00440 and Dkt #16 in 2:12-cr-00451] be lifted temporarily to enable him to travel outside of Clark County, Nevada for work from August 28, 2017-September 3, 2017. Mr. Toli's boss needs him to travel from Las Vegas, Nevada to Idaho, Montana, and Wyoming for work purposes, however he needs court permission to travel outside of Clark County, Nevada. The work Mr. Toli did in Cedar City, Utah pursuant to the Court's

1 last order granting the temporary lifting of his travel restriction was completed early, and Mr.
2 Toli has been asked to travel to Idaho, Montana, and Wyoming for completion of additional
3 work.


4 DATED this 25th day of August, 2017.

5 6 7 8 9	MELANIE HILL Law Office of Melanie Hill By: <u>/s/ Melanie A. Hill</u> MELANIE A. HILL <i>Attorney for Defendant Olive Toli</i>	DANIEL G. BOGDEN United States of America By: <u>/s/ Robert Knief</u> ROBERT KNIEF <i>Attorney for Plaintiff</i>
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11 **ORDER**

12 IT IS HEREBY ORDERED that the travel restriction condition of Olive Toli's release
13 on appearance bond limiting his travel to Clark County [Dkt #69 in 2:12-cr-00440 and Dkt #16
14 in 2:12-cr-00451] be lifted temporarily to enable him to travel from Las Vegas, Nevada to
15 Idaho, Montana, and Wyoming for work purposes from August 28, 2017-September 3, 2017.

16 Dated: August 28, 2017.

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19 _____
20 ANDREW P. GORDON
21 UNITED STATES DISTRICT JUDGE
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